Official Participation in a Leadership Position of a 501(c) Non-profit Organization

Analysis Worksheet

Date Received: IC: Employee Name:	
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Start Date: Senior/Top 5? (Y/N):

Name of organization	
Has the Organization been established as a	
501(c)? Provide evidence.	
Is the organization deemed	
"professional?" Provide evidence and	
description of the 501(c).	
Describe the relationship to the	
employee's official duties and how	
participation will advance NIH	
programmatic or policy goals and benefit	
the Government	
What is the employee's anticipated length	
of service in the position	
What is the employee's anticipated time	
commitment (in relation to official duties)?	
Organization mission consistent with and	
furthers NIH mission?	
What is the title of the leadership	
position?	
Provide a description of responsibilities	
governing the position	
Has background/supporting	
documentation been provided (e.g.,	
bylaws/constitution, list of board of	
directors, invite/nomination letter etc)?	
Briefly describe and attach documentation	
Is there evidence of representation on	
behalf of another before the government	
(18 USC 205)? If so, describe the resolution.	
resolution.	

Is there expected participation in business affairs? If so, describe the resolve.	
Is there evidence of supplementation of salary (18 USC 209)? If, so describe the resolution.	
Is there expected involvement in fundraising (2635.808)? If so, describe the resolution.	
Is there expected involvement in political activities (5 USC 7324)? If so, describe the resolution.	
Is there expected involvement in lobbying (18 USC 1913)? If so, describe the resolution.	
Is there any appearance of preferential treatment among NIH employee's serving in leadership positions with the organization (e.g. other NIHers on board) • Other NIH employee's requested and been denied service • NIH has other official relations with the organization If so, please explain.	
Is there evidence of agency support (e.g. use of agency funds for travel, meals, etc.)?	
Does the employee currently participate in other NIH matters that involve the organization? If so, please describe.	
Has the employee formerly served the organization in a personal capacity within the past year (cooling off period of recusal)? If so, please explain.	
Does participation in a leadership position in an official capacity require an authorization? If so, has the authorization been included in the current request?	
Have any 208 conflict of interest issues been identified? If so, what are they and how have they been resolved?	

Have any 502 appearances of a conflict of		
interest been identified? If so, what are		
they and how have they been resolved?		
Has the employee obtained supervisor		
approval per the ODA memo?		
IC Ethics Official:	Recommendation:	Date:
	Concurrence	
	☐ Non-Concurrence	
NEO Specialist:	Recommendation:	Date:
	Concurrence	
	☐ Non-Concurrence	
NEO Management:	Recommendation:	Date:
	Concurrence	
	☐ Non-Concurrence	